

LUKAS, NACE, GUTIERREZ & SACHS, LLP

1650 TYSONS BOULEVARD, SUITE 1500
MCLEAN, VIRGINIA 22102
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
DAVID A. LAFURIA
PAMELA L. GIST
TODD SLAMOWITZ*
TODD B. LANTOR*
STEVEN M. CHERNOFF*
KATHERINE PATSAS*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEILA REZANAVAZ
—
OF COUNSEL
GEORGE L. LYON, JR.
LEONARD S. KOLSKY*
JOHN CIMKO*
J. K. HAGE III*
JOHN J. MCAVOY*
HON. GERALD S. MCGOWAN*
TAMARA DAVIS BROWN*
—
*NOT ADMITTED IN VA

February 27, 2009

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

Great Call, Inc.

Dear Ms. Dortch:

On behalf of Great Call, Inc. and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carrier's 2008 CPNI certification with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Enclosure

cc: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 25, 2009

Name of company(s) covered by this certification: GreatCall, Inc.

Form 499 Filer ID: 826587

Name of signing officer: Ray Morris

Title of signatory: Chief Operating Officer

CERTIFICATION

I, Ray Morris, hereby certify that I am an officer of the company(s) named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.



Name: Ray Morris

Title: Chief Operating Officer

Date: February 25, 2009

STATEMENT

Great Call, Inc. ("Great Call") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Great Call has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Great Call continually educates and trains its employees regarding the appropriate use of CPNI. Great Call has established disciplinary procedures should an employee violate the CPNI procedures established by Great Call.
- Great Call has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Great Call maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Great Call also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Great Call has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Great Call compliance for a minimum period of one year. Specifically, Great Call's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Great Call has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Great Call's retail locations, electronically or otherwise. In connection with these procedures, Great Call has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Great Call has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Great Call has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Great Call took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Great Call at a state commission, in the court system, or at the Federal Communications Commission: None.

- The following is information Great Call has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps Great Calls are taking to protect CPNI: Employees are trained to be diligent with CPNI and assure identification.
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
 - Number of customer complaints Great Call received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI:
0
 - Category of complaint:
 - 0 Number of instances of improper access by employees
 - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
 - 0 Number of instances of improper access to online information by individuals not authorized to view the information
 - 0 Number of other instances of improper access or disclosure
 - Summary of customer complaints received in 2008 concerning the unauthorized release of CPNI: